

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	Crim. No. 13-10200 GAO
v.	)	
	)	
DZHOKHAR TSARNAEV	)	

**ASSENTED-TO MOTION TO ENLARGE TIME FOR  
FILING DISCOVERY MOTION**

Defendant moves that this Court enlarge from March 12, 2014 to March 28, 2014 the time for filing discovery motions in this case.

As grounds for this motion, undersigned counsel states as follows.

- 1) On February 12, 2014, this Court set March 12, 2014 as the deadline for filing discovery motions regarding present discovery disputes.
- 2) Consistent with the procedures outlined in Local Rule 116.3(A), undersigned counsel sent letters requesting further discovery from the government on February 6, 13, and 14, 2014. A follow up letter seeking to obtain production deadlines for items previously promised, but not yet produced, and attempting to clarify requests the government had rejected as not sufficiently specific was sent on February 28, 2014.
- 3) The government sent defense counsel a partial response to pending requests on March 6, 2014. In that response, government counsel stated that it would provide a final response on March 14, 2014.

- 4) Local Rule 116.3(G) provides that “[a]ny discovery motion shall be filed within fourteen (14) days of the opposing party’s written reply to the letter requesting discovery[.]”
- 5) Because the government needs until March 14, 2014 to provide a final response to pending requests, the government agreed to assent to a request to extend the deadline to file discovery motions to, and including March 28, 2014.

DZHOKHAR TSARNAEV  
by his attorneys

/s/ Miriam Conrad

Judy Clarke, Esq.  
California Bar: 76071  
CLARKE & RICE, APC  
1010 Second Avenue, Suite 1800  
San Diego, CA 92101  
(619) 308-8484  
[JUDYCLARKE@JCSRLAW.NET](mailto:JUDYCLARKE@JCSRLAW.NET)

David I. Bruck, Esq.  
220 Sydney Lewis Hall  
Lexington, VA 24450  
(540) 460-8188  
BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)  
Timothy Watkins, Esq. (BBO # 567992)  
William Fick, Esq. (BBO # 650562)  
FEDERAL PUBLIC DEFENDER OFFICE  
51 Sleeper Street, 5th Floor  
(617) 223-8061  
MIRIAM\_CONRAD@FD.ORG  
TIMOTHY\_WATKINS@FD.ORG  
WILLIAM\_FICK@FD.ORG

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 7, 2014.

/s/ Miriam Conrad